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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13
14 v.
15 ERICKA CHAVEZ,
Defendant.

No. CR 06-00607 DLJ

**STIPULATION RE: CONTINUANCE OF
STATUS CONFERENCE AND TO
EXCLUDE TIME; ORDER**

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17 The defendant, through her counsel of record and plaintiff, through its counsel of record,
18 hereby stipulate that the status conference in the above-entitled matter, presently set for June 20,
19 2007 may be continued to July13, 2007 at 9:00AM. This stipulation is entered into at the
20 request of counsel for the defendant and Government counsel to allow additional time for the
21 parties to pursue settlement negotiations and the preparation of a plea agreement.

22 The parties further stipulate that the time from June 20, 2007 to July 13, 2007 is
23 excludable under the Speedy Trial Act (18 USC § 3161 et seq) and in particular, sections 18
24 USC §§ 3161(h)(8)(B)(i) and 3161 (h)(8)(B)(iv) to allow for adequate preparation and
25 continuity of counsel and further that the ends of justice outweigh the public's interest in a
26 speedy trial.
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1 It is so stipulated.

/s/ Scott S. Furstman

2 Dated: June 19, 2007

3 SCOTT S. FURSTMAN
4 Attorney for Defendant,
5 Ericka Chavez

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7 Dated :June 9, 2007

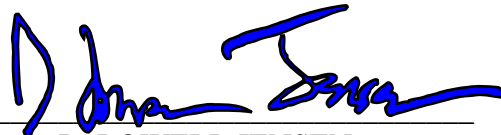
/s/ Kimberly Briggs

8 KIMBERLY M. BRIGGS
9 Assistant U.S. Attorney
per telephonic authority

10 **ORDER**

11 Good cause appearing and the parties having stipulated thereto, it is ordered that status
12 conference in the above-entitled matter is continued from June 20, 2007 to June 13, 2007 at 9:00
13 AM. It is further ordered that the time between June 20, 2007 and July 13, 2007 is excludable
14 under 18 USC §§ 3161 (h)(8)(B)(i) and (iv) to allow for adequate preparation and continuity of
15 counsel and that the ends of justice outweigh the public's interest in a speedy trial.
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17

18
19 Dated: June 20, 2007

20 

21 D. LOWELL JENSEN
22 United States District Judge
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PROOF OF SERVICE
[C.C.P. 1013(a)]

I, the undersigned, declare:

I am a citizen of the United States and a resident of the County of Santa Clara. I am over the age of eighteen (18) years and not a party to the within entitled action. My business address is: 510 North Third Street, San Jose, CA 95112. On June 19, 2007, I served a copy of the document(s) described below:

- (X) [BY MAIL] By depositing such copy(ies) in a sealed envelope, First Class postage fully prepaid, in a facility regularly maintained by the United States Postal Service for collection and mailing.
- () [BY OVERNIGHT DELIVERY] By consigning such copy in a sealed envelope to an overnight courier for next business day delivery.
- () [BY HAND DELIVERY] By consigning such copy in a sealed envelope to a messenger for guaranteed hand delivery.
- (X) [BY FACSIMILE TRANSMISSION] By consigning such copy to a facsimile operator for transmittal.

STIPULATION RE: CONTINUANCE
AND EXCLUDABLE TIME; [PROPOSED ORDER]

in the manner identified above on those persons listed below:

Kimberly M. Briggs
Assistant U.S. Attorney
1301 Clay Street, Suite 340S
Oakland, CA 94612

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 19, 2007 at San Jose, California.

/s/ Scott S. Furstman

Scott S. Furstman